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November 30, 2001

Via US Mail and e-mail

Christine Todd Whitman, Administrator
U.S. Environmental Protection Agency (EPA)
P.O. Box 1473
Merrifield, VA 22116

**Re: Rubber and Plastic Additives (RAPA) Panel, Consortium No.
HPV Chemical Challenge Program Submission
Benzothiazole-based Thiazoles Category
Category Justification and Testing Rationale**

Dear Governor Whitman:

The RAPA Panel of the American Chemistry Council is pleased to submit the subject documents to EPA's HPV Chemical Challenge Program (Program) as our initial test plan for a category covering four of the 39 chemicals RAPA is voluntarily sponsoring in the Program. The RAPA Panel includes the following member companies: Bayer Corporation, Ciba Specialty Chemicals Corporation, Crompton Corporation, Flexsys America L.P., The Goodyear Tire & Rubber Company, The Lubrizol Corporation, Noveon, Inc., R.T. Vanderbilt Company, Inc., and UOP, LLC.

In this submission, please find the *Category Justification and Testing Rationale* for the category *Benzothiazole-based Thiazoles*. Four chemicals in the category are sponsored in the Program, as listed in the following table:

RAPA Panel Benzothiazole-based Thiazole Category Chemicals Sponsored in the US HPV Chemical Challenge Program	
CAS Number	Compound Name
95-32-9	Benzothiazole, 2-(morpholinodithio)-
149-30-4	2(3H)-Benzothiazolethione
155-04-4	2(3H)-Benzothiazolethione, zinc salt
2492-26-4	2(3H)-Benzothiazolethione, sodium salt



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Data for two additional chemicals in the category, listed in the table below, are used to support the conclusions reached for the category.

RAPA Panel Benzothiazole-based Thiozole Category Additional Chemicals in the Category	
CAS Number	Compound Name
95-16-9	Benzothiozole
120-78-5	Benzothiazole, 2,2'-dithiobis-,

In addition to the *Category Justification and Testing Rationale*, please also find attached robust summaries contained in IUCLID-formatted documents for each of the four sponsored chemicals and the two supporting chemicals in the category.

This submission is also being sent electronically to the following e-mail addresses:

Oppt.ncic@epa.gov
Chem.rtk@epa.gov

If you require additional information, please contact the RAPA Panel's technical contact, Dr. Anne P. LeHuray at (703) 741-5630 or anne_lehuray@americanchemistry.com.

Sincerely yours,

Courtney M. Price
Vice President, CHEMSTAR

Attachments

cc: C. Auer, EPA/OPPT
B. Leczynski, EPA/OPPT
RAPA Panel (without attachments)
S. Russell, ACC (without attachments)